

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

# Application Review

**Issue Date:**

**Region:** Fayetteville Regional Office  
**County:** Bladen  
**NC Facility ID:** 0900009  
**Inspector's Name:** Gregory Reeves  
**Date of Last Inspection:** 03/25/2019  
**Compliance Code:** 3 / Compliance - inspection

<p align="center"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> Chemours Company - Fayetteville Works</p> <p><b>Facility Address:</b>          Chemours Company - Fayetteville Works          22828 NC Highway 87 West          Fayetteville, NC 28306</p> <p><b>SIC:</b> 2869 / Industrial Organic Chemicals  <b>NAICS:</b> 32512 / Industrial Gas Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b>  <b>Fee Classification: Before:</b> Title V <b>After:</b></p>				<p align="center"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b>  <b>NSPS:</b>  <b>NESHAP:</b>  <b>PSD:</b>  <b>PSD Avoidance:</b>  <b>NC Toxics:</b>  <b>112(r):</b>  <b>Other:</b></p>																																																			
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<p><b>Review Engineer:</b> Heather Sands</p> <p><b>Review Engineer's Signature:</b>                      <b>Date:</b></p>				<p align="center"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 03735/T45  <b>Permit Issue Date:</b>  <b>Permit Expiration Date:</b></p>																																																			

## I. Purpose of Application

The Chemours Company – Fayetteville Works (Chemours) facility currently holds Title V Permit No. 03735T44 with an expiration date of March 31, 2021, for a chemical manufacturing company in Fayetteville, Bladen County, North Carolina. This permit application (No. 0900009.19A) is for an administrative amendment to change the classification of Boiler PS-B from a “unit designed to burn light liquid fuel” to a “unit designed to burn gas 1” and remove the conditions that are no longer required for this boiler.

## II. Project Description

Chemours Company – Fayetteville Works is a chemical manufacturing facility. The facility currently manufactures chemicals, plastic resins, plastic sheeting, and plastic film. The facility consists of two individual manufacturing plants (the FPS/IXM, or Nafion,<sup>®</sup> Process and the PPA Process), a boiler house and a waste treatment operation. The facility has a two permanent boilers onsite, one permanent boiler which is permitted but not yet constructed, and one permitted temporary boiler. Chemours is a major source of criteria pollutants under the 40 CFR Part 70 (Title V) Operating Permit Program, a major source of hazardous air pollutants (HAP), and a major source under New Source Review (NSR).

All currently permitted boilers are capable of burning natural gas and No. 2 fuel oil. However, No. 2 fuel oil is rarely fired at the facility. When the Title V permit was renewed in 2016, Chemours requested that one of the existing boilers, PS-B, be permitted as a “unit designed to burn light liquid fuel,” as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters under 40 CFR Part 63, Subpart DDDDD, also referred to as Boiler Maximum Achievable Control Technology (MACT). Therefore, the current permit contains Boiler MACT conditions for Boiler PS-B applicable to the light liquid fuel subcategory.

The original classification of Boiler PS-B was designed to allow Chemours the flexibility of burning fuel in the boiler without the time constraints associated with a unit designed to burn gas 1 fuels. Chemours is submitting this administrative amendment to change the subcategory classification of Boiler PS-B from a “unit designed to burn light liquid fuel” to a “unit designed to burn gas 1 fuel.” As such, the boiler can be included in the already-existing permit conditions for gas 1 units under Boiler MACT and the light liquid fuel conditions are no longer applicable and can be removed. Because Boiler PS-B was subject to a Case-by-Case MACT under 112(j), the Boiler MACT does not become effective until May 20, 2019.

There is no change in actual emissions associated with this permit modification.

## III. Permit Modifications

The table below outlines the proposed change to the current permit (Permit No. 089610T20) for this administrative amendment.

Old Page No.	New Page No.	Condition No.	Description of Change(s)
Cover letter	Cover letter	--	- Amended application type, permit revision numbers and dates.
Cover letter attachment	Cover letter attachment	Summary of changes to permit	- Updated with summary of changes to permit.
1	1	Permit Cover Page	- Updated permit revision number and permit issuance date
3 – 58	3 – 73	All	- Updated permit revision number in header; - Updated permit language to match permit shell.
3 – 4	3 – 4	Section 1.0	- Updated page numbers

Old Page No.	New Page No.	Condition No.	Description of Change(s)
21 – 35	21 – 39	Section 2.1 A	<ul style="list-style-type: none"> <li>- Revised summary of limits and standards table to remove reference to emission limits associated with units designed to burn light liquid fuel and added Boiler PS-B to the list of affected sources subject to work practices under Subpart DDDDD;</li> <li>- Revised A.7 to add Boiler PS-B to existing source requirements under the Subpart DDDDD units designed to burn gas 1 fuels subcategory.</li> <li>- Removed condition A.8 because it is no longer applicable to Boiler PS-B.</li> </ul>

## V. Facility Compliance Status

DAQ has reviewed the compliance status of this facility with respect to its Title V Air Permit. The most recent inspection of the facility was conducted on February 21, 2019 by Mr. Greg Reeves with the Fayetteville Regional Office (FRO). No problems were discovered during the physical inspection of the sources and during records review at the facility. During the onsite inspection, the facility appeared to be operating in compliance. It should be noted that the Chemours facility is currently undergoing compliance issues with respect to their water and wastewater permits, and this compliance status does not address those issues.

## VI. Public Notice/EPA and Affected State(s) Review

This permit action is for an administrative amendment as per 15A NCAC 2Q .0514 and public notice is not required. However, as allowed under 15A NCAC 02Q .0521(a), the DAQ Director has determined that a public notice opportunity for comments is in the best interest of the public. Therefore, notice of the draft Title V Permit was issued on April 18, 2019. The notice will provide for a 30-day comment period.

Public Notice of the DRAFT Title V Permit ran from April 19, 2019, to **XXXX YY, 2019**. *Summarize comments received.*

## V. Conclusions, Comments, and Recommendations

The issuance of Air Quality Permit No. 03735T45 to Chemours is recommended.